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In Propria Persona



**UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

TODD R. G. HILL, et al,

Plaintiffs

vs.

**THE BOARD OF DIRECTORS,
OFFICERS AND AGENTS AND
INDIVIDUALS OF THE PEOPLES
COLLEGE OF LAW, et al.,**

Defendants.

CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM

The Hon. Josephine L. Staton
Courtroom 8A, 8th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

**NOTICE OF SUBMISSION OF REDLINE
COMPARISON PURSUANT TO DOCKET
311**

NO ORAL ARGUMENT REQUESTED

NOTICE OF SUBMISSION OF REDLINE COMPARISON PURSUANT TO DOCKET 311

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**NOTICE OF SUBMISSION OF REDLINE COMPARISON PURSUANT TO
DOCKET 311**

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff respectfully submits this notice and accompanying redline comparison pursuant to the Court's May 22, 2025 Order (Dkt. 311), which directed the submission of a redline version comparing the operative Fourth Amended Complaint to the proposed Fifth Amended Complaint.

I. PROCEDURAL CLARIFICATION REGARDING REFERENCE VERSION

Plaintiff respectfully notes that the redline submitted herewith reflects changes between the operative Fourth Amended Complaint and the Corrected Proposed Fifth Amended Complaint submitted via EDSS on May 22, 2025 (Tracking No. EDS-250522-002-0524). As of the time of this filing, the corrected version has not yet been docketed. However, a supplemental notice (EDSS Tracking No. EDS-250522-002-0533) and corresponding courtesy communications were submitted to chambers and all counsel clarifying that the corrected version constitutes the intended reference point pursuant to the Court's order at Dkt. 311. This clarification was filed and is reiterated here in the interest of judicial economy and to preserve the integrity of the procedural record in light of the Court's scheduling framework.

II. SUBMISSION CHRONOLOGY AND RECORD INTEGRITY MEASURES

Plaintiff submitted his proposed Fifth Amended Complaint after hours on Monday, May 19, 2025, via the Court's Electronic Document Submission System (EDSS). The filing was not docketed until the morning of Thursday, May 22, 2025, as Dkt. 310. Later that same afternoon, the Court issued an in-chambers order (Dkt. 311) requiring Plaintiff to file a redline comparison between the

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operative Fourth Amended Complaint and the proposed Fifth Amended Complaint no later than Monday, May 26, 2025, Memorial Day, a federal holiday the Court traditionally observes. This sequencing compressed Plaintiff's response window to a practical maximum of two business days. In response, and to avoid any procedural ambiguity, Plaintiff promptly filed a corrected version of the proposed Fifth Amended Complaint the same day (May 22), along with a signed declaration, notice of errata, and a supplemental clarification identifying the corrected version as the intended reference for the redline. These actions were taken to preserve the integrity of the record, ensure compliance with the Court's scheduling order, and preempt any procedural mischaracterization of the operative pleading.

Plaintiff confirms that the redline reflects changes between the operative Fourth Amended Complaint and the corrected Proposed Fifth Amended Complaint, not the version docketed as Dkt. 310, which reflected an earlier working draft and included inadvertent references to previously dismissed individuals. The correction was submitted promptly, causes no prejudice to any party, and is consistent with the Court's scheduling order and the interests of judicial efficiency.

As no party has relied on the originally docketed version and the corrected version remains pending, this notice is submitted to clarify the procedural basis of the redline and to preserve the integrity of the record.

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1 Respectfully submitted,

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3 Dated: May 23, 2025

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8 Todd R. G. Hill
9 Plaintiff, Pro Se

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12 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**

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14 The undersigned party certifies that this brief contains 462 words, which complies with the 7,000-
15 word limit of L.R. 11-6.1.

16 Respectfully submitted,

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20 May 23, 2025
21 Todd R.G. Hill
22 Plaintiff, in Propria Persona

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Plaintiff's Proof of Service

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

Respectfully submitted,



May 23, 2025
Todd R.G. Hill
Plaintiff, in Propria Persona

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